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7 *Attorneys for Defendant*
8 *Lincare Holdings Inc.*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 SALLY LENNON, an Individual;
12
13 Plaintiff,

14 v.

15 LINDE, PLC., d/b/a LINDE NORTH
AMERICA HOLDINGS, LTD., d/b/a
16 LINCARE HOLDINGS, INC., d/b/a
PREFERRED HOMECARE, LLC., d/b/a
FOUNDERS HEALTHCARE, LLC.,
17 LINCARE INC., a Foreign Corporation;
KENNETH CHAPMAN, an individual;
18 DOES 1 Through 25, inclusive; and ROE
CORPORATIONS 1 Through 25, inclusive,
19
20 Defendants.

Case No. 2:23-cv-00105-RFB-BNW

**STIPULATION TO CONTINUE
DEADLINE FOR DEFENDANT
LINCARE HOLDINGS, INC. TO
RESPOND TO PLAINTIFF'S FIRST
AMENDED COMPLAINT**

(First Request)

21 Plaintiff Sally Lennon, and Defendant Lincare Holdings Inc.¹ (“Defendant”) hereby
22 stipulate to continue Defendant’s deadline to respond to Plaintiff’s First Amended Complaint
23 from July 6, 2023 to July 20, 2023. The reason for the parties’ stipulation is as follows:

24 On or about June 15, 2023, Plaintiff filed her First Amended Complaint, adding Defendant
25 as a new party; counsel for Defendant executed an Acceptance of Service on June 22, 2023. Since
26 then, Defendant has diligently attempted to gather information necessary to determine the

27
28 ¹ The Complaint’s caption incorrectly names all defendants as “dba” forms of each other. The only appropriate “dba”
is Founders Healthcare LLC dba Preferred Homecare.

appropriate nature of Lincare Holdings Inc.'s response to the First Amended Complaint. However, gathering the requisite information has been difficult as a result of relevant individuals being out of the office on vacation and/or the July 4, 2023 holiday. As such, the parties have agreed that Defendant's deadline to respond to Plaintiff's First Amended Complaint will be continued from July 6, 2023 to July 20, 2023 to allow Defendant's counsel the opportunity to collect necessary information and prepare a response.

By entering into this Stipulation, Defendant is not waiving (and is expressly reserving) any affirmative defenses and rights to assert jurisdictional challenges.

DATED this 5th day of July 2023.

HOLLAND & HART LLP

/s/ Dora V. Lane

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Attorneys for Lincare Holdings, Inc.

DATED this 5 July 2023.

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Attorneys for Plaintiff, Sally Lennon

ORDER

IT IS SO ORDERED

DATED: 11:33 am, July 06, 2023

BRENDA WEKSLER

UNITED STATES MAGISTRATE JUDGE

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